

# DEPARTMENT OF ENVIRONMENTAL CONSERVATION

## AIR QUALITY CONSTRUCTION PERMIT

**Permit No.: 066CP01**

September 12, 2003

Application Number: X-161

The Department of Environmental Conservation (Department), under the authority of AS 46.14 and 18 AAC 50, issues Construction Permit No. 066CP01 to the Permittee: **Union Oil Company of California.**

This permit satisfies the obligation of the owner and operator to obtain a construction permit as set out in AS 46.14.130(a).

As required by AS 46.14.120(c), the Permittee shall comply with the terms and conditions of this construction permit.

[18 AAC 50.320(b), 1/18/97]

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John F. Kuterbach, Manager  
Air Permits Program

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## List of Abbreviations Used in this Permit

AAC	Alaska Administrative Code
ADEC	Alaska Department of Environmental Conservation
AS	Alaska Statutes
ASTM	American Society of Testing and Materials
bhp	brake horsepower or boiler horsepower <sup>1</sup>
CEMS	Continuous Emission Monitoring System
C.F.R.	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
dscf	Dry standard cubic feet
EPA	US Environmental Protection Agency
gr/dscf	grain per dry standard cubic feet (1 pound = 7000 grains)
GPH	gallons per hour
HHV	Higher heating value
ID	Source Identification Number
kW	kilowatts
MACT	Maximum Achievable Control Technology
Mlb	thousand pounds
MMBtu	Million British Thermal Units
NAICS	North American Industry Classification System
NESHAPs	Federal National Emission Standards for Hazardous Air Pollutants [as defined in 40 CFR 61]
NSPS	Federal New Source Performance Standards [as defined in 40 CFR 60]
ppm	Parts per million
ppmv	Parts per million volume
PS	Performance specification
PSD	Prevention of Significant Deterioration
RM	Reference Method
SIC	Standard Industrial Classification
TPH	Tons per hour
TPY	Tons per year
Wt%	weight percent

## Pollutants

CO	Carbon Monoxide
HAPS	Hazardous Air Pollutants [as defined in AS 46.14.990(14)]
H <sub>2</sub> S	Hydrogen Sulfide
NO <sub>x</sub>	Oxides of Nitrogen
PM <sub>10</sub>	Particulate Matter [as defined in 18 AAC 50.990(70)]
SO <sub>2</sub>	Sulfur Dioxide
VOC	Volatile Organic Compound [as defined in 18 AAC 50.990(103)]

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<sup>1</sup> 1 boiler horsepower = 33,472 Btu-fuel per hp-hr divided by the boiler's efficiency. Approximately 7000 Btu-fuel per bhp-hr is required for an average diesel IC engines.

## **Section 1 - Identification**

### **Names and Addresses**

Permittee: **Union Oil Company of California**  
P.O. Box 196247  
Anchorage, AK 99519-6247

Facility: **Granite Point Platform**

Location: 60° 57' 30" North; 151° 19' 53" West

Physical Address: Upper Cook Inlet, Alaska

Owner: Union Oil Company of California  
P.O. Box 196247  
Anchorage, AK 99519-6247

Exxon Mobil Corporation is a limited partner

Operator: Union Oil Company of California

Permittee's Responsible Official: Dale Haines, Unocal Alaska Operations Manager

Designated Agent: CT Corporation System  
801 West 10th Street, Suite 300  
Juneau, Alaska 99801

Facility and Building Contact: Mark Atkins  
Phone (907) 776-6650

Fee Contact: David Bailey  
Union Oil Company of California  
P.O. Box 196247  
Anchorage, AK 99519-6247  
(907) 263-7967  
dbailey@unocal.com

SIC Code of the Facility: 1300 - Oil and Gas Extraction

NAICS Code: 211111

[18 AAC 50.350(b), 1/18/97]

## ***Section 2 - Emission Information and Classification***

### **Emissions of Regulated Air Contaminants, as provided in Permittee's application:**

Oxides of Nitrogen (NO<sub>x</sub>), Sulfur Dioxide (SO<sub>2</sub>), Carbon Monoxide (CO), Particulate Matter, and Volatile Organic Compounds (VOC).

### **Construction Permit Classifications:**

Note: Facility Classifications are described under 18 AAC 50.300(b) through (g), modification classifications are described under 18 AAC 50.300(h), and owner requested limits are described under 305(a)(1) through (4).

This construction permit authorizes a modification classified under 18 AAC 50.300 (h)(2).

[18 AAC 50.320(a)(2), 1/18/97]

### **Section 3 - Source Inventory and Description**

- 1. Authorization and Notification Requirements.** The Permittee is authorized to modify and operate the facility in accordance with the construction permit application as may be currently applicable. This permit authorizes the Permittee to install a diesel-fired reciprocating engine rated at 275 hp for the emergency firewater pump.

The source listed below has specific monitoring, recordkeeping, or reporting conditions in this construction permit. The source description and rating are given for identification purposes only. The facility equipment inventory prior to the project is listed in Operating Permit No.066TVP01.

**Table 1: Construction Permit Source Inventory**

<b>Tag No.</b>	<b>Source Name</b>	<b>Source Description</b>	<b>Fuel</b>	<b>Maximum Nominal Rating/Size</b>
P-PM-4570	Firewater Pump Engine	Clarke Model IK6H-UF80	Diesel	275 hp

## ***Section 4 - Ambient Air Quality Standards and Maximum Allowable Ambient Concentrations***

**General Description.** This permit contains terms and conditions to ensure that allowable emissions from the facility and associated growth will not cause an ambient concentration that exceeds the concentrations established in Table 6 of 18 AAC 50.310(d)(2) at any location that does not or would not meet the ambient air quality standard or maximum allowable ambient concentration.

- 2. Annual Operational Limit.** The permittee may operate the Firewater Pump Engine, Tag No. P-PM-4570, no greater than 200 hours per twelve-month rolling total.
  - 2.1 The permittee shall install and operate an hour meter that records total hours of operation on the firewater pump engine.
  - 2.2 Record the total hours that the Firewater Pump Engine operates each month.
  - 2.3 Report the 12-month rolling total operational hours each month in the facility operating report required in Section 10. "General Recordkeeping, Reporting, and Compliance Certification Requirements," of Operating Permit No. 066TVP01.

### ***Section 5 - State Emission Standards***

3. **Opacity, Particulate Matter and Sulfur Dioxide.** For the Firewater Pump Engine, Tag No. P-PM-4570, comply with state emission standards for fuel burning equipment as set out in Section 7, "Insignificant Sources" of Operating Permit No. 066TVP01.



## ***Section 6 - Permit Documentation***

July 3, 2003	Letter from Dale Haines (Unocal) to Jim Baumgartner (ADEC), notification of proposed project and request for permit applicability determination.
July 9, 2003	Letter from Jim Baumgartner to Dale Haines, permit applicability determination.
July 30, 2003	Email from Janet Bounds (Unocal) to Jim Baumgartner, request to proceed with construction permit.
September 4, 2003	Letter from Daniel Bevington (Kenai Peninsula Borough) to Jim Baumgartner, comments on proposed construction permit.
September 5, 2003	Letter from Janet Bounds to Jim Baumgartner, comments on proposed construction permit.